

ALONSO, ANDALKAR & FACHER, P.C.

ATTORNEYS AT LAW
32 BROADWAY
NEW YORK, NEW YORK 10004
(212) 598-5900
WWW.ALONSOLEGAL.COM

MARK J. ALONSO⁺
MANOJ R. ANDALKAR^{+<*}
CATANIA T. FACHER^{+†}

KARINE TER-GRIGORYAN⁺
JENNIFER RANKIN⁺
VICTORIA SCHWARTZ⁺

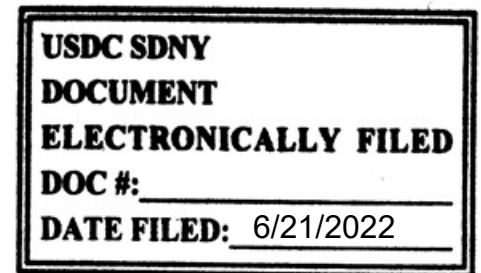
TELECOPIER (833) 598-4675
EMAIL: CFACHER@ALONSOLEGAL.COM

ERIN MACAVOY
OF COUNSEL

⁺ MEMBER OF THE NY BAR
< MEMBER OF THE NJ BAR
† MEMBER OF THE FL BAR
* MEMBER OF THE MA, PA AND AZ BARS

June 17, 2022

Hon. Robert W. Lehrburger
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1960
New York, NY 10007-1312
Via ECF Filing



Re: *Gonzalez v. Savasta and Company Inc., et al.*
Civil Case No.: 1:21-CV-09456

Dear Honorable Sir:

This office represents Defendants, Savasta & Company, Inc. and Linda Kellner [hereinafter "Defendants"] with regard to the above-referenced matter. We are writing to inform you that the parties have agreed on the monetary component of settlement and are currently in the process of agreeing on the nonmonetary component. The parties have exchanged drafts of the settlement agreement and are discussing the terms with their respective clients. As such, the parties jointly request to postpone the following deadlines in the instant matter:

(1) Defendant's Reply to Plaintiff's Opposition to the Motion to Dismiss the First Amended Complaint, currently due June 17, 2022;

(2) the protocol for electronic discovery as per the Rule 26 Order signed by Your Honor, currently due June 22, 2022;

(3) Initial Disclosures by both parties as per the Rule 26 Order signed by Your Honor, currently due July 1, 2022.

There has been one prior request to adjourn items (1) and (2) above, however, there have been no prior requests to adjourn item (3). The parties request that all deadlines be adjourned through July 8, 2022, as we anticipate filing a Stipulation of Dismissal by said date.

Thank you for your considerations in this matter.

Very truly yours,



Catania T. Facher

cc: Rudy Dermesropian, Esq.

SO ORDERED:



6/21/2022

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE